



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd Floor
New York, New York 10007

May 19, 2022

BY ECF

Hon. Victor Marrero, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write jointly on behalf of all parties respectfully to request a further adjournment of the deadline for Plaintiffs to file an application, if they choose to do so, for fees under the Equal Access to Justice Act. The deadline is currently May 20, 2022. (ECF No. 142). The parties seek an adjournment until July 1, 2022, to allow them additional time to discuss the issue of fees. Since the parties' last update to the Court (ECF No. 141), the undersigned counsel conducted further consultations with the defendants, and subsequently informed counsel for the Plaintiffs that they are now authorized to confer substantively about a potential consensual resolution of this outstanding issue. In the coming days and weeks, the parties expect to engage in these conferrals, and will also alert the Court if the parties believe that the Court's assistance may be helpful.

The parties thank the Court for its consideration of this joint request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendants

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